

3. I am a member in good standing of the Southern District of Texas. I am also a member in good standing of the Bars of the States of Connecticut and New York and the Commonwealth of Massachusetts, the United States Supreme Court, the United States Circuit Courts of Appeal for the Second and Ninth Circuits, and the United States District Courts for the District of Connecticut, the Northern District of Illinois, District of Massachusetts, and Eastern and Southern Districts of New York.

4. I submit this Declaration in support of §10(b) Plaintiffs' Motion for Class Certification and Appointment of §10(b) Class Representatives and §10(b) Class Counsel filed herewith.

5. Over the past nine years, I served as Pomerantz's lead litigator in *In re BP p.l.c. Sec. Litig.*, No. 4:10-md-2185 (S.D. Tex.), securities fraud lawsuits arising from BP's 2010 Gulf of Mexico oil spill, in which a confidential, favorable monetary settlement was recently reached for all of my firm's 35 clients in the matter, including NSHEPP. NSHEPP played an active role in the case, including reviewing drafts of the complaints and various pleadings; reviewing drafts of key briefing such as the briefs successfully opposing three motions to dismiss involving numerous complex arguments under both U.S federal and English law; participating in discovery, including collecting and producing documents; and overseeing the successful settlement of the litigation.

6. Attached hereto as Exhibit ("Ex.") A is a true and correct copy of Pomerantz LLP's firm resume.

7. Attached hereto as Ex. B is a true and correct copy of The Briscoe Law Firm, PLLC's firm resume.

8. Attached hereto as Ex. C is a true and correct copy of Robbins Geller Rudman & Dowd LLP's firm Resume.

9. Attached hereto as Ex. D is a true and correct copy of the Declaration of Stefan Cowell on behalf of the §10(b) Lead Plaintiff in Support of Class Certification and Appointment of §10(b) Class Representatives and §10(b) Class Counsel.

10. Attached hereto as Ex. E is a true and correct copy of the Declaration of Sheldon Albritton on behalf of additional Plaintiff Pontiac in Support of Class Certification and Appointment of §10(b) Class Representatives and §10(b) Class Counsel.

11. Attached hereto as Ex. F is a true and correct copy of the Expert Report of Dr. Zachary Nye, Ph.D., dated September 29, 2021, along with its exhibits.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 29th day of September, 2021.

/s/ Matthew L. Tuccillo, Esq.
Matthew L. Tuccillo, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of September 2021, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing, as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Matthew L. Tuccillo, Esq.
Matthew L. Tuccillo, Esq.